

Office of the United States Attorney Western District of Wisconsin (608) 264-5158 TTY (608) 264-5006

For Immediate Release

Contact Person

April 1, 2005

Elizabeth Altman Assistant U.S. Attorney

Madison, Wisconsin -- Stephen P. Sinnott, Acting United States Attorney for the Western District of Wisconsin, announced that a complaint was filed today in federal court in Madison charging Matthew Reller, 23, of Cottage Grove, Cody Shafer, 19, of Cambridge, and Jason Hoffman, 19, of Lake Mills, with bank robbery. They are charged with the robbery of the American National Bank in Helenville, Wisconsin on March 31, 2005.

If convicted, each defendant faces a maximum penalty of 20 years in prison, a \$250,000 fine, and 3 years of supervised release. A copy of the complaint's affidavit is attached.

The charges against Reller, Shafer, and Hoffman are the result of an investigation conducted by the Jefferson County Sheriff's Department, the Waukesha County Sheriff's Department, the Town of Summit Police Department, the Town of Oconomowoc Police Department, and the Federal Bureau of Investigation. Prosecution of this case has been assigned to Assistant U.S. Attorney Elizabeth Altman.

You are advised that a charge is merely an accusation and that a defendant is presumed innocent until and unless proven guilty.

STATE OF WISCONSIN)

DANE COUNTY)

- I, Steven L. Paulson, being first duly sworn on oath, depose and state as follows:
- 1. I am a Special Agent with the Federal Bureau of Investigation. I have been employed as a Special Agent for 10 years. As a Special Agent, I am authorized to conduct criminal investigations into violations of federal criminal law. All information contained in this affidavit is information from other law enforcement officers whom I believe to be reliable. The information contained in this affidavit is for the limited purpose of establishing probable cause that a crime was committed and does not constitute all the information known to me about the investigation.
- 2. Based on the information described below, I submit that probable cause exists to believe that Matthew Reller, Cody Shafer, and Jason Hoffman knowingly and unlawfully took, by force and violence, and by intimidation, from the person and presence of others, money totaling approximately \$20,000, this money belonging to, and in the care, custody, control, management and possession of the American National Bank, Helenville, Wisconsin, an institution the deposits of which were then insured by the Federal Deposit Insurance Corporation, in violation of Title 18, United States Code, Section 2113(a).
- 3. Jefferson County Detective Sergeant Larry Lee informed me on March 31, 2005 (a) that employees of the American National Bank reported to police that at

approximately 9:30 a.m. on March 31, 2005, the American National Bank, located at W3308 Highway 18, Helenville, Wisconsin was robbed by two men wearing masks and displaying what appeared to be handguns; (b) that one man was displaying a black gun and one was displaying a silver gun; and (c) that the robbers left the bank with approximately \$7,500, including bait bills, and entered a waiting vehicle driven by a third man. The vehicle was described as a black Pontiac Grand Am with red and blue pin stripes. It was later determined by dispatch sheets that the bank robbery actually occurred at 9:54 a.m.

- 4. A description of the vehicle was relayed to local law enforcement at approximately 9:56 a.m. Officers in the area positioned themselves in such ways to best watch for the vehicle. At approximately 10:02 a.m. State Patrol Trooper Lynch observed a vehicle matching the description. Lynch noted that the vehicle had three occupants. When Lynch informed dispatch about this information, dispatch advised Trooper Lynch that there should be three males in the vehicle. As Lynch was following the vehicle, she noted that the brake lights came on just prior to several intersections, as if the driver was looking to turn.
- 5. The vehicle that Lynch was following was stopped by Lynch and other officers. Inside the vehicle were three men, identified as Matthew Reller, Cody Shafer, and Jason Hoffman.
- 6. In a search of the vehicle, officers found two duffle bags in the trunk. Inside one duffle bag was a large amount of money. Inside the other duffel bag were what appeared to be hand guns, one black and one silver.

7. Law enforcement officers interviewed Matthew Reller. Among other

things, Reller admitted that he was approached by Shafer and Hoffman about robbing

the bank. He stated that he did not want to enter the bank, but agreed to drive.

8. Law enforcement officers also interviewed Cody Shafer. Among other

things, Shafer admitted to entering the bank and robbing it.

9. Law enforcement officers also interviewed Jason Hoffman. Among other

things, Hoffman admitted to entering the bank and robbing it.

10. When law enforcement officers counted the money recovered from the

duffle bag, they determined it to be \$19,998.59. The bank reported missing \$20,098.69.

11. On March 31, 2005, I spoke to Jason Benzing, the Branch Manager at the

American National Bank in Helenville Wisconsin who told me that the bank is FDIC

insured.

Dated this 1st day of April, 2005.

STEVEN L. PAULSON, Special Agent

Federal Bureau of Investigation

Sworn to before me this 1st day of April, 2005

_/S/ ___ STEPHEN L. CROCKER

United States Magistrate Judge